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10 *Sitel Operating Corporation*

11 **UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF NEVADA**

13 BRANDI LODING AND TONSANIA
14 COLLINS, individually and on behalf of
others similarly situated,

15 Plaintiffs,

16 vs.

17 SITEL OPERATING CORPORATION , a
18 Delaware Corporation

19 Defendant.

CASE NO.: 2:16-cv-02047-JAD-CWH

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT
SITEL OPERATING CORPORATION
TO RESPOND TO PLAINTIFFS'
COMPLAINT**

(Third Request)

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21 Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, Defendant, Sitel Operating Corporation
22 (“Sitel” or “Defendant”) by and through their undersigned counsel, Anthony L. Martin and Dana
23 B. Salmonson, of the law firm of Ogletree, Deakins, Nash, Smoak & Stewart, P.C., and Plaintiffs
24 Brandi Loding and Tonsania Collins (“Plaintiffs”), by and through their undersigned counsel, Don
25 Springmeyer and Bradley S. Schrager, of the law firm Wolf, Rifkin, Shapiro, Schulman, & Rabkin,
26 LLP, hereby agree to extend the time for Defendant to file a response to Plaintiff’s Complaint
27 twenty-two (22) days, as the twenty-first day falls on a holiday, up to and including May 30, 2017.
28 The present deadline is May 8, 2017.

1 This is the parties' third request for an extension of the response deadline. The parties first
2 submitted a request to extend the response deadline on December 1, 2017 (ECF No. 8) because the
3 parties were engaged in early settlement discussions and requested additional time to further
4 discuss this matter. Further, the parties were working on the global resolution of two related
5 matters filed in other jurisdictions - *i.e. Gaffers v. Sitel Worldwide Corp. and Sitel Operating*
6 *Corp.*, M.D. Tenn. Case No. 3:16-0128 and *Adams v. Sitel Operation Corporation*, M.D. N.C.
7 Case No. 1:16-cv-01051. The request was granted on December 5, 2017. (ECF No. 9.)

8 The parties next submitted a request to extend the response deadline on February 6, 2017 in
9 an effort to finalize mediation dates and continue their good faith discussions. (ECF No. 10.) The
10 request was granted on February 7, 2017. (ECF No. 11.) Since that time, the parties have
11 scheduled mediation for May 10, 2017.

12 As indicated in the parties' first two requests to extend the response deadline, the parties
13 have also entered into an agreement to voluntarily toll the statutes of limitation applicable to the
14 claims of the named, opt-in, and putative Plaintiffs in these matters during the pendency of their
15 discussions regarding potential resolution. Consequently, the parties are requesting an extension of
16 time up to and including May 30, 2017 for Defendants to respond to Plaintiffs' Complaint should
17 this matter not resolve at the May 10, 2017 mediation.

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This request is being made to promote efficiency, the interests of justice, and judicial economy and not for the purpose of undue delay.

IT IS SO STIPULATED:

DATED this 8th day of May, 2017.

DATED this 8th day of May, 2017.

SOMERS SCHWARTZ, P.C.

OGLETREE, DEAKINS, NASH, SMOAK
& STEWART, P.C.

/s/ Kevin J. Stoops

/s/ Dana B. Salmonson

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*Attorneys for Plaintiffs Brandi Loding,
Tonsania Collins individually and on behalf
of others similarly situated*

IT IS SO ORDERED.

DATED: May 9, 2017

C.W. HOFFMAN, JR.
UNITED STATES MAGISTRATE JUDGE